

EXHIBIT 3

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMMANUEL G. JUSTINIANO, JOSE NIEVES,
JOSE BARBOSA, DAHEED WILLIS, ANTHONY
KEITT, FRANK FODERA, JOSHUA MOSS,
OSCAR PUERTA, LUIS ARENAZA,
GUILLERMO MUNOZ, MILTON LAVERDE,
WILLIE S. BREWER, ISMAEL FRANCISCO,
STEVE M. NG, MANUEL SANTOS, JULIO
RIVERA, FREDDY VELEZ, BRYONT A LOPEZ,
MIGUEL CABREJA, JUAN VEVAS, TERRENCE
JONES, NICOLAS SALGADO, LUIS A. VEGA,
LOUIS TELESE, KENNETH WARING, ANTONY
G. HILL, JOSE GOMEZ ROSARIO, RODERICK
MASHALL, JOSE BLANCO, DAVID BAEZ,
KENYA EARLY, SAMMY HERNANDEZ,
NELSON MINYETY, BILL DELVIN, EDWIN J.
RAMIREZ CESPEDES, BENTO RODRIGUEZ,
PAUL STARAPOLA, ANDRES REYES, JESUS A.
MARTINEZ, DAVID BEACH, JONATHAN
DELROSARIO, JAMES SHAW, GARFIELD
GAMMON, DESEAN ALLEN, DERREK
HUGHES, JORGE A. MILANES, *and* CARMELO
NYANDUGAR, *each individually and on behalf of*
all other individuals similarly situated,

Plaintiffs,

v.

PHOENIX BEVERAGES, INC., WINDMILL
DISTRIBUTING COMPANY LP, d/b/a
PHOENIX/BEEHIVE, RODB, LLC, LONGFENG
TRUCKING, LLC, PHOENIX BEVERAGES MTO,
LLC, FORBEE CAPITAL KEG FUND, LLC,
HEINEKEN NORTH AMERICA, INC.,
HEINEKEN USA INCORPORATED, RODNEY
BREYMAN, GREGORY BREYMAN, PAUL
ROSSI, JOSEPH STANICH, *and* GEORGE
STRADA,

Defendants

Case No. 13-CV-2332 (LTS) (JLC)

VERIFICATION

Each of the undersigned, the initial Plaintiffs in this case (the "Lead Plaintiffs"),
being duly sworn, deposes and says:

1. I am one of the five original plaintiffs in this matter. I make this affidavit
freely and voluntarily, based on my own personal knowledge and after consultation with my
attorneys at the Harman Firm.

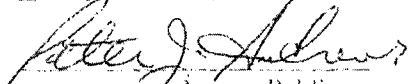
2. The vehicles I have driven for the delivery of Defendants' beer products
and the return of empty containers for at least the three-year period prior to April 9, 2013 weigh
more than 10,000 pounds.

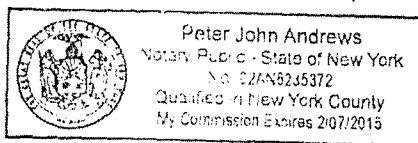
3. All drivers and helpers employed by Defendants, whether named Plaintiffs
or not, drive and have driven the same type of vehicles in Defendants' beer delivery and return of
empty containers business as I do.

4. I acknowledge that the wages I receive fulfill the compensation
requirements of the New York Labor Law.


EMMANUEL G. JUSTINIANO

Sworn to before me this
20th day of January, 2014.


Notary Public



JAN-17-2014 17:41

P.003

Jose Nieves
JOSE NIEVES

Sworn to before me this
17th day of January, 2014.

Peter J. Andrews
Notary Public



Peter John Andrews
Notary Public - State of New York
No. 02AN6235372
Qualified in New York County
My Commission Expires 2/07/2015

Jose Barobosa
JOSE BAROBOSA

Sworn to before me this
17th day of January, 2014.

Peter J. Andrews
Notary Public



Peter John Andrews
Notary Public - State of New York
No. 02AN6235372
Qualified in New York County
My Commission Expires 2/07/2015

DAHEED WILLIS
DAHEED WILLIS

Sworn to before me this
__th day of January, 2014.

Notary Public

ANTHONY KEITT
ANTHONY KEITT

Sworn to before me this
__th day of January, 2014.

Notary Public